NORLITE CORPORATION

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January 24, 2012

Mr. William J. Clarke
Regional Permit Administrator
New York State Department of Environmental Conservation
Region 4
1130 North Westcott Road
Schenectady, NY 12306-2014 RETURN RECEIPT REQUESTED VIA EMAIL

Mr. Kenneth Eng
Air Compliance Branch
United States Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866 RETURN RECEIPT REQUESTED VIA EMAIL

Re: Norlite Corporation-MACT Excessive Exceedance Report
Kiln 1: 01/13/12 – 01/18/12
Kiln 2: 01/13/12 – 01/18/12

Dear Sirs:

In accordance with 40 CFR 63.1206(c)(3)(vi), the Norlite Corporation (Norlite) is submitting an "Excessive Exceedance Report" for the timeframe of 01/13/12 thru 01/18/12. The attached document explains each of the "malfunctions" for Kiln One & Two.

The results of the investigation concluded the majority of the exceedances were a result of the span limit associated with the stack gas flow monitor. During several days of operation, Norlite experienced strong wind gusts and extreme cold out of the northwest and west. The strong winds plus the extreme cold caused the steam to condense in the stack. The condensed water droplets affected the Stack Gas Flow Meter. Norlite and its consultant will continue to evaluate each exceedance in order to implement the proper corrective action to further decrease the amount of MACT exceedances.

All of the malfunctions that occurred were consistent with our Startup, Shutdown and Malfunction Plan (SSMP). As approved by the NYSDEC on February 6, 2006, these reports are being sent electronically.

Should you have any questions regarding this letter, please contact me at (518) 235-0401 or email at: tvanvranken@norlitecorp.com.

Sincerely,

Thomas Van Vranken

Thomas Van Vranken
Environmental Manager

Attachments
ecc: Don Spencer, NYDEC – R4 w/attachments
James Lansing, NYSDEC – CO w/attachments
Joe Hadersbeck, NYSDEC – R4 w/attachments

DCL: 2393

NORLITE CORPORATION
MACT EXCEEDANCE REPORT - KILN 1
01/13/12 - 01/18/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
1/13/2012	8:14:58	1/13/2012	8:16:10	0:01:12	14	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
1/13/2012	15:16:49	1/13/2012	15:17:36	0:00:47	15	Malfunction	Strong Wind Gusts Out of the West Caused the Reference Pressure to Increase Which Caused the Pressure D.P. to Decrease	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted Draft in the Kiln to Increase Rear Chamber System Pressure
1/13/2012	15:55:27	1/13/2012	15:55:58	0:00:31	16	Malfunction	Strong Wind Gusts Out of the West Caused the Reference Pressure to Increase Which Caused the Pressure D.P. to Decrease	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted Draft in the Kiln to Increase Rear Chamber System Pressure
1/13/2012	16:03:46	1/13/2012	16:04:24	0:00:38	17	Malfunction	Strong Wind Gusts Out of the West Caused the Reference Pressure to Increase Which Caused the Pressure D.P. to Decrease	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted Draft in the Kiln to Increase Rear Chamber System Pressure
1/13/2012	16:05:34	1/13/2012	16:06:24	0:00:50	18	Malfunction	Strong Wind Gusts Out of the West Caused the Reference Pressure to Increase Which Caused the Pressure D.P. to Decrease	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted Draft in the Kiln to Increase Rear Chamber System Pressure
1/13/2012	16:11:19	1/13/2012	16:12:02	0:00:43	19	Malfunction	Strong Wind Gusts Out of the West Caused the Reference Pressure to Increase Which Caused the Pressure D.P. to Decrease	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted Draft in the Kiln to Increase Rear Chamber System Pressure
1/13/2012	16:18:57	1/13/2012	16:19:33	0:00:36	20	Malfunction	Strong Wind Gusts Out of the West Caused the Reference Pressure to Increase Which Caused the Pressure D.P. to Decrease	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted Draft in the Kiln to Increase Rear Chamber System Pressure
1/13/2012	19:22:33	1/13/2012	19:22:55	0:00:22	21	Malfunction	Strong Wind Gusts Out of the West Caused the Reference Pressure to Increase Which Caused the Pressure D.P. to Decrease	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted Draft in the Kiln to Increase Rear Chamber System Pressure
1/14/2012	15:44:22	1/14/2012	16:10:06	0:25:44	22	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the West	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/14/2012	16:57:33	1/14/2012	16:59:06	0:01:33	23	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the West	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/16/2012	0:01:26	1/16/2012	0:03:09	0:01:43	24	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/18/2012	13:45:05	1/18/2012	13:46:53	0:01:48	25	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow
1/18/2012	13:47:08	1/18/2012	13:47:25	0:00:17	26	Malfunction	Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span	LGF Flow	Span	Adjusted Fuel Flow

NORLITE CORPORATION
MACT EXCEEDNACE REPORT - KILN 2
01/13/12 - 01/18/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
1/13/2012	15:18	1/13/2012	15:21	0:02:31	19	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the West	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/13/2012	17:18	1/13/2012	17:21	0:02:53	20	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the West	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/13/2012	17:28	1/13/2012	17:47	0:18:34	21	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the West	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/14/2012	15:41	1/14/2012	15:43	0:02:08	22	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the West	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/14/2012	15:45	1/14/2012	15:50	0:05:13	23	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the West	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/14/2012	15:56	1/14/2012	15:58	0:01:46	24	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the West	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/14/2012	16:00	1/14/2012	16:15	0:14:23	25	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the West	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/16/2012	0:01	1/16/2012	0:04	0:03:03	26	Malfunction	Extreme Cold and Low Dew Point Caused the Steam In the Stack to Condense and Cause Water Droplets to Fault the Probe Which Caused The Upper Instrument Setpoint to be Reached for Stack Gas	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/16/2012	0:10	1/16/2012	0:11	0:00:46	27	Malfunction	Extreme Cold and Low Dew Point Caused the Steam In the Stack to Condense and Cause Water Droplets to Fault the Probe Which Caused The Upper Instrument Setpoint to be Reached for Stack Gas	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/16/2012	0:14	1/16/2012	0:16	0:01:33	28	Malfunction	Extreme Cold and Low Dew Point Caused the Steam In the Stack to Condense and Cause Water Droplets to Fault the Probe Which Caused The Upper Instrument Setpoint to be Reached for Stack Gas	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/16/2012	0:21	1/16/2012	0:24	0:02:31	29	Malfunction	Extreme Cold and Low Dew Point Caused the Steam In the Stack to Condense and Cause Water Droplets to Fault the Probe Which Caused The Upper Instrument Setpoint to be Reached for Stack Gas	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/16/2012	0:36	1/16/2012	0:38	0:01:23	30	Malfunction	Extreme Cold and Low Dew Point Caused the Steam In the Stack to Condense and Cause Water Droplets to Fault the Probe Which Caused The Upper Instrument Setpoint to be Reached for Stack Gas	Stack Gas Flow Rate	Span	Adjusted Fuel Flow

1/16/2012	0:47	1/16/2012	1:01	0:13:50	31	Malfunction	Extreme Cold and Low Dew Point Caused the Steam In the Stack to Condense and Cause Water Droplets to Fault the Probe Which Caused The Upper Instrument Setpoint to be Reached for Stack Gas	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/16/2012	1:49	1/16/2012	1:51	0:01:43	32	Malfunction	Extreme Cold and Low Dew Point Caused the Steam In the Stack to Condense and Cause Water Droplets to Fault the Probe Which Caused The Upper Instrument Setpoint to be Reached for Stack Gas	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/16/2012	2:29	1/16/2012	2:30	0:00:35	33	Malfunction	Extreme Cold and Low Dew Point Caused the Steam In the Stack to Condense and Cause Water Droplets to Fault the Probe Which Caused The Upper Instrument Setpoint to be Reached for Stack Gas	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/16/2012	3:20	1/16/2012	3:21	0:00:31	34	Malfunction	Extreme Cold and Low Dew Point Caused the Steam In the Stack to Condense and Cause Water Droplets to Fault the Probe Which Caused The Upper Instrument Setpoint to be Reached for Stack Gas	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/16/2012	3:21	1/16/2012	3:21	0:00:25	35	Malfunction	Extreme Cold and Low Dew Point Caused the Steam In the Stack to Condense and Cause Water Droplets to Fault the Probe Which Caused The Upper Instrument Setpoint to be Reached for Stack Gas	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/16/2012	3:41	1/16/2012	3:42	0:00:29	36	Malfunction	Extreme Cold and Low Dew Point Caused the Steam In the Stack to Condense and Cause Water Droplets to Fault the Probe Which Caused The Upper Instrument Setpoint to be Reached for Stack Gas	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/16/2012	4:02	1/16/2012	4:02	0:00:29	37	Malfunction	Extreme Cold and Low Dew Point Caused the Steam In the Stack to Condense and Cause Water Droplets to Fault the Probe Which Caused The Upper Instrument Setpoint to be Reached for Stack Gas	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/16/2012	4:17	1/16/2012	4:18	0:00:23	38	Malfunction	Extreme Cold and Low Dew Point Caused the Steam In the Stack to Condense and Cause Water Droplets to Fault the Probe Which Caused The Upper Instrument Setpoint to be Reached for Stack Gas	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/16/2012	4:26	1/16/2012	4:26	0:00:34	39	Malfunction	Extreme Cold and Low Dew Point Caused the Steam In the Stack to Condense and Cause Water Droplets to Fault the Probe Which Caused The Upper Instrument Setpoint to be Reached for Stack Gas	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/16/2012	4:31	1/16/2012	4:31	0:00:22	40	Malfunction	Extreme Cold and Low Dew Point Caused the Steam In the Stack to Condense and Cause Water Droplets to Fault the Probe Which Caused The Upper Instrument Setpoint to be Reached for Stack Gas	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/16/2012	7:23	1/16/2012	7:51	0:27:27	41	Malfunction	Extreme Cold and Low Dew Point Caused the Steam In the Stack to Condense and Cause Water Droplets to Fault the Probe Which Caused The Upper Instrument Setpoint to be Reached for Stack Gas	Stack Gas Flow Rate	Span	Adjusted Fuel Flow

1/16/2012	9:58	1/16/2012	10:12	0:13:15	42	Malfunction	Extreme Cold and Low Dew Point Caused the Steam In the Stack to Condense and Cause Water Droplets to Fault the Probe Which Caused The Upper Instrument Setpoint to be Reached for Stack Gas	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/16/2012	13:05	1/16/2012	13:24	0:19:42	43	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the West	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/16/2012	17:59	1/16/2012	18:03	0:03:43	44	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span Due to Strong Wind Gusts Out of the West	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
1/18/2012	3:58	1/18/2012	3:59	0:00:50	45	Malfunction	While Controlling LGF Line Pressure with Valves, a Fuel Flow Surge was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns